

Exhibit 1



IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: TESTOSTERONE REPLACEMENT
THERAPY PRODUCTS LIABILITY
LITIGATION

MDL No. 2545

Master Docket Case No. 1:14-cv-01748

Hon. Judge Matthew F. Kennelly

This document relates to:

MEDICAL MUTUAL OF OHIO,

Plaintiff,

v.

ABBVIE INC., ABBOTT LABORATORIES,
ABBOTT PRODUCTS, INC., SOLVAY
AMERICA, INC., SOLVAY NORTH
AMERICA, LLC, SOLVAY
PHARMACEUTICALS, INC., SOLVAY
PHARMACEUTICALS SARL, SOLVAY,
S.A., AUXILIUM, INC., ELI LILLY AND
COMPANY, LILLY USA, INC., ACRUX
LIMITED, ACTAVIS PLC, ACTAVIS, INC.,
ACTAVIS PHARMA, INC. WATSON
PHARMACEUTICALS, INC., WATSON
LABORATORIES, INC., ANDA, INC., and
ENDO PHARMACEUTICALS, INC.,

Defendants.

No. 1:14-cv-08857

**AFFIDAVIT OF PAUL VANDERHOEVEN
REGARDING SOLVAY, S.A.**

I, Paul Vanderhoeven, being duly sworn, hereby declare and state as follows:

1. I am Senior Manager of Finance Projects for Solvay, S.A., a defendant in this action.

2. I am an adult citizen and resident of Belgium and am competent to provide this Affidavit. Based upon my personal knowledge, information presently available to me as a result of the scope and duties of my employment, including from communications from or with various company personnel who possess relevant information obtained in the course and scope of their employment, and/or review of relevant corporate records, I am knowledgeable about the subjects included in this Affidavit.

3. Solvay, S.A. is a corporation organized and existing under the laws of the nation of Belgium. Solvay, S.A.'s principal place of business is located in Brussels, Belgium. Solvay, S.A. has never been incorporated anywhere in the United States and has never maintained its principal place of business anywhere in the United States.

4. Solvay, S.A. has no employees in Illinois, Ohio, or anywhere else in the United States.

5. Solvay, S.A. does not have any offices or manufacturing facilities in Illinois, Ohio, or anywhere else in the United States. Solvay, S.A. does not own or lease any office space or other real property in Illinois, Ohio, or anywhere else in the United States.

6. Solvay, S.A. is not registered to conduct business in Illinois, Ohio, or anywhere else in the United States.

7. Solvay, S.A. has ownership interests in hundreds of subsidiaries and affiliates that are engaged in the production and sale of a wide array of chemical products. Solvay, S.A. currently holds no ownership interests, direct or indirect, in any entity engaged in the development, design, manufacture, testing, labeling, distribution, marketing, promotion, or sale of pharmaceutical products.

8. Prior to February 15, 2010, Solvay, S.A. had indirect ownership interests in several subsidiaries engaged in the production and sale of pharmaceuticals. However, Solvay, S.A. itself did not at any time develop, design, manufacture, test, label, distribute, market, promote, or sell any pharmaceutical products. Solvay, S.A. did not at any time develop, design, manufacture, test, label, distribute, market, promote, or sell the AndroGel® product that is at issue in this litigation.


9. From approximately July 1999 to February 15, 2010, AndroGel® was developed, manufactured, marketed, and sold in the United States by two indirect subsidiaries of Solvay, S.A.: Solvay Pharmaceuticals, Inc. and its wholly-owned subsidiary, Unimed Pharmaceuticals, Inc.

10. On February 15, 2010, Solvay Pharmaceuticals, S.A. and Terlin, B.V. (both of which were indirect subsidiaries of Solvay, S.A.) sold to Abbott Laboratories all of the subsidiaries engaged in the production and sale of pharmaceuticals in which Solvay, S.A. had held an indirect ownership interest, including those indirect subsidiaries engaged in the development, design, manufacture, testing, labeling, distribution, marketing, promotion, or sale of AndroGel® in the United States.

11. At all times relevant to this lawsuit, Solvay Pharmaceuticals, Inc. and Unimed Pharmaceuticals, Inc. were separate corporations that operated independently of Solvay, S.A., and performed or managed their own day-to-day business functions, such as manufacturing, marketing, sales, research and development, clinical work, quality control, and regulatory and compliance functions. Solvay Pharmaceuticals, Inc. and Unimed Pharmaceuticals, Inc. had their own officers, directors, and business leadership.

12. I declare that the foregoing is true and correct.

Executed on this _____ day of March, 2015 at _____.


Paul Vanderhoeven

Subscribed to and sworn
Before me this _____ day of
March, 2015.

Le Notaire Bernard WILLOCX, soussigné,
de résidence à Bruxelles, certifie que la (les)
signature(s) apposée(s) *ci-dessus*
..... est (sont)
bien celle(s) de *Monsieur Paul*
VANDERHOEVEN

Notary Public

Bruxelles, le *13.03.2015*

